



The Honorable Lorna G. Schofield, U.S.D.J.

United States District Court, Southern District of New York Thurgood

Marshall United States Courthouse

40 Foley Square

New York, NY 10007

The application is GRANTED. By **April 26, 2021**, Defendants shall answer, move or otherwise respond to the Complaint. The parties' attention is directed to the requirement for pre-motion letters per the Individual Rules. By **April 8, 2021**, Plaintiff shall effect service on the remaining un-served Defendants and file proof of service

SO ORDERED

Dated: March 30, 2021
New York, New York

Re: *Saveene Corp. v. Ernest B. Remo, et al.*
Case No.: 1:21-00399-LGS



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

Winget, Spadafora & Schwartzberg LLP represents Defendant Action Stock Transfer Corp. in the above-referenced action. Pursuant to your Honor's Individual Rules of Practice, Rule I. B. 2, we respectfully submit this letter in support of our request for an extension of time to answer, move, or otherwise respond to Plaintiffs' Complaint from March 26, 2021, to April 26, 2021.

This is Defendant Action Stock Transfer Corp.'s first such request. We have conferred with Martin Shell, Esq., counsel for the Plaintiff, and he has consented to our requested extension of time. A copy of the stipulation reflecting Plaintiff's consent is enclosed.

Defendant Action Stock Transfer Corp.'s requested extension is also warranted as we were recently retained and our office needs the requested extension to investigate the allegations to evaluate whether some or all of the causes of action should be addressed through a pre-answer motion. Moreover, granting a brief extension of time will not interfere with any scheduling order as none presently exists.

Thank you for your consideration in this matter. Should Your Honor request any further information, please do not hesitate to contact us.

Respectfully submitted,

/s/ *Anthony D. Green*
Anthony D. Green, Esq. (AG0227)
Counsel for Action Stock Transfer Corp.

Encl.

cc: All Counsel of Record *via ECF*